



Mostardi Platt

EC
10/1/02

1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplattnv.com

October 1, 2002

Mr. William E. Muno
Director Superfund
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RECEIVED
OCT 03 2002

SUPERFUND DIVISION
OFFICE OF THE DIRECTOR

Re: Clayton Chemical/R.R.G.-Superfund Site
One Mobile Avenue, Sauget, Illinois
St. Clair County

EPA Region 5 Records Ctr.



285172

Dear Mr. Muno:

Please be advised that Mostardi Platt Environmental (MPE) is retained to manage the environmental affairs of Lyon Metal Products, L.L.C., 420 North Main Street, Montgomery, Illinois 60538 as it concerns the subject matter.

An in depth review, evaluation/analysis of the file reports, site assessments, manifests, multi-media inspections by the USEPA and IEPA has been investigated. MPE believes the record of facts and exhibits will technically support and establish that Lyon Metal Products (Lyon), which is listed as a potentially responsible party (PRP) in the USEPA March 6, 2002 General Notice Letter Respondent Group, had little or no environmental impairment impact at the site for the time frame 1995 to 1998 based on the submitted following facts:

1. Lyon did not arrange for the disposal of hazardous substances at the Clayton/(RRG) TSDF facility. Lyon did contract with Environmental Waste Services (EWS) Permit UPM0526006 for the recovery of paint flush (F005), which consists of 90% toluene and 10% resin recyclable material. EWS operates as a broker and took title to the paint flush end product for the proper regulatory management. Lyon considers the paint flush to be a valuable resource recovery product with a high solvent power content a monetary return on investment. The paint flush solvent (F005) was manifested in accordance with DOT EPA regulations, properly labeled identifying Lyon. The sole purpose and intent of the transaction was to implement a program of reclamation of a high-grade distillation service in the spirit of the Resource Conservation Recovery Act (RCRA). The RRG site was investigated and found to be fully permitted by USEPA/IEPA to accept spent solvents for distillation recovery applications. The toluene (CAS 108-88-3) returned to Lyon in commerce on a quick turnaround basis. The paint flush spent solvents were processed separately from other solvent waste streams. The hazardous resin residue shipped off-site from RRG for energy recovery in a permitted cement kiln.

2. An on-site inspection was conducted by the writer to ascertain the regulatory compliance in 1997. Lyon instructed the operational personnel to process the paint flush toluene aromatic solvent as received immediately upon receipt through the distillation process for a high-quality pure solvent, and returned to Lyon, utilizing the standard commercial bill of lading. RRG was instructed not to combine and/or mix any other solvent chlorinated classifications with the Lyon aromatic product. All Lyon drums were labeled for identification. A certificate of destruction was issued to Lyon, on a quick turnaround procedure. The compliance procedure insured a brief residence at RRG. Continued surveillance was conducted of the RRG site. The RRG site was not utilized in after November 1997.
3. On May 13 and 14, 1997, a multi-media inspection was conducted at the subject facility. Participating in the inspection was the USEPA, IEPA, and the American Bottoms regional wastewater treatment plant. A RCRA Part B permit issued effective May 8, 1996, was still in effect to perform solvent recovery and waste fuel blending. The three (3) types of waste residue generated from routine day-to-day operations at RRG are shipped to permitted TSDF sites. The inspection did not identify any Lyon drums in inventory for processing.
4. The Roy F. Weston, Inc. (Weston) and Project Resources, Inc. (PRI) were retained under USEPA Superfund Technical Assessment and Response Team (START) Contract 68-W-00-19 to perform a removal site evaluation of drums, tanks, containers, sampling and reviewing the analytical data at the RRG site. All HAZCAT activities were conducted under the authority of the USEPA on-scene coordinator on June 5 through 7, 2001. The drum team verified drums, containers, and the inventory lists provided by RRG. The team counted drums, containers, various sized and shaped tanks, miscellaneous throughout the property. The drum team inventory summaries were found in Tables 4-9 through 4-12 of the report. A review of the tables and drum dock building inventory survey did not indicate or identify Lyon as a generator, having any drums and/or product at the site (Exhibit A).
5. On May 28, 2002, Enviro-Vac, Jacksonville, Illinois, submitted a bid proposal to the PRP respondent group to remove the liquid waste inventory at RRG. The scope of work (SOW) included hazardous bulk liquid removal, non-hazardous bulk liquid removal, tank cleaning, sludge removal, and drums. The drum storage area did not indicate and/or identify any Lyon product or drums (gun flush/toluene) at the site (Exhibit B).
6. Over a protracted period of time (1950 to 1998), the site (RRG) was utilized by a multiplicity of S.I.C. groups which involved those compounds of concern (COCs) which have impacted and contributed to the contamination and potential release which currently exists at the site. It is not reasonable, logical or equitable to arbitrarily pursue remedy from the PRPs involved for the brief time frame period 1995 through 1998. This represents only a small percentage of

the thousands of potential responsible parties over a span of 50 years. Under CERCLA, cleanup liability includes: present owners, past owners, lessor, commercial brokers, lessees, lenders, corporate executives, transporters, environmental brokers, etc. Not to include the fact that there are 14 superfund sites on the perimeter and directly adjacent to the RRG site, which may have also impacted the facility. The overall cleanup strategy should include all contributors to the remediation. This will minimize the cost of the group (Exhibit C).

7. There were no Lyon drums left at the site when RRG took control in 1996.
8. A review of the waste in the list procured from the USEPA of the RRG site indicated a final volumetric ranking dated February 25, 2002, for Lyon of about 161,000 gallons representing a 7.32 percentile (3030) drums. The spent gun paint flush solvent (F005) was transported for distillation material recycling and returned. Lyon does not characterize this product as waste but a return on the original investment, a valuable resource conservation management effort. The content of the spent solvent is estimated at 5 to 10% resin, 90 to 95% solvent toluene. Estimating a 90% distillation efficiency:

$$\begin{array}{rcl} 161,000 & \text{gallons} & \\ - 16,000 & = 10\% \text{ resin} & \\ \hline 144,900 & = \text{gallons solvent toluene} & \end{array}$$

$$\begin{array}{rcl} 144,900 & & \\ - 14,490 & \text{Less 10\% resin residue} & \\ \hline 130,410 & \text{Gallons toluene} & \end{array}$$

Based on the above, MPE is requesting that Lyon be given proper consideration for its efforts and reclassify Lyon as a *de minimis* participant contributor in the adjusted volumetric rank of 14,490 gallons (Exhibit D).

In summary, in all of the drum inventories and multi-agency investigations, no Lyon product drums were identified which technically supports Lyon's claim that it had little or no environmental impact at the RRG site.

I would personally appreciate an appointment with you at your earliest convenience. Your prompt response to this request to *de minimis* category and the waste-in list adjusted down to include waste-out (recycled material) considered for a total of 14,490 gallons volumetric ranking.

U.S. Environmental Protection Agency
MPE Project M023401
October 1, 2002
Page 4

Thank you for your cooperation. My phone number is 630-993-2158, fax 630-993-9017.

Respectfully submitted,

MOSTARDI PLATT ENVIRONMENTAL



Philip J. Molé, P.E., C.H.M.M.
Vice President

Enclosures

cc: Lyon Metal Products
R. Peter Washington
D. Harrison
J. Gusselin

Patrick Kinnally
2114 Deerpath Road
Aurora, Illinois 60507-5030

Janet Haynes
Nascote
c/o 375 Magna Drive
Aurora, Ontario L4G7L6
Canada

K. Fetzner

Exhibit A

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SALGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
ADM Vitamin E	2235A	1	Hazardous Solids	77	passed flammable
Republic	2219A	1	Hazardous Solids	7	
Republic	2219A	1	Hazardous Solids	8	
RPS	2233A	2	Toxic Solids	78	
ADM Corn Sweetener	2174A	3	Hazardous Solids	25	
Komatsu	2220B	3	Hazardous Solids	37	
Komatsu	2220B	3	Hazardous Solids	29	
Chemetco	2191A	6	Hazardous Solids	47	
Nascote	2242A	13	Hazardous Solids	95	
Nascote	2242A	13	Hazardous Solids	100	
Nascote	2242A	13	Hazardous Solids	99	
Nascote	2242A	13	Hazardous Solids	98	
Nascote	2242A	13	Hazardous Solids	97	
Nascote	2242A	13	Hazardous Solids	96	
Nascote	2242A	13	Hazardous Solids	95	
Nascote	2242A	13	Hazardous Solids	94	
Nascote	2242A	13	Hazardous Solids	93	
Nascote	2242A	13	Hazardous Solids	92	
Nascote	2242A	13	Hazardous Solids	91	
Nascote	2242A	13	Hazardous Solids	89	
Nascote	2242A	13	Hazardous Solids	88	
Nascote	2242A	13	Hazardous Solids	87	
Nascote	2242A	13	Hazardous Solids	86	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	

Table 4-9

**DRUM DOCK STORAGE INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SAUGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001**

Generator	PDS NO.	Bay #	Description	IEPA #	Comments
RRG CCC Inventory	NA	1	Asphalt Sealer	1	
RRG CCC Inventory	NA	1	Asphalt Sealer	2	
RRG CCC Inventory	NA	1	Asphalt Sealer	3	
Owens	1897B	13	Caustic	32	
Owens	1897B	13	Caustic	34	
Owens	1897A	13	Caustic	36	passed corrosive
Owens	1897A	13	Caustic	33	
Komatsu	2160C	13	Caustic Solids	21	
Komatsu	2160C	13	Caustic Solids	9	
ADM Packaging	1571A	13	Corrosive	19	
Nascote	2243A	13	Corrosive	40	
Wagoner	1783A	13	Corrosive	26	
Overtime	2082A	13	Corrosive	117	
RRG Internal	Internal	4	Haz. Liquid (from samples)		Found in Bay 3
Bazan	2248	5	Hazardous Solids	can't read	
ADM Bio	2148A	6	Hazardous Solids	Not found	Not found
Bazan	2248	6	Hazardous Solids	55	passed flammable
RRG Internal	Internal	6	Hazardous Solids	57	
RRG Internal	Internal	6	Hazardous Solids	46	
RRG Internal	Internal	6	Hazardous Solids	45	
RRG Internal	Internal	4	Hazardous Solids	44	
RRG Internal	Internal	4	Hazardous Solids	43	
ADM Bio	2184A	7	Hazardous Semi-Solids	54	
Nascote	2242A	1	Hazardous Solids	70	
Nascote	2242A	3	Hazardous Solids	71	
ADM Corn Sweetener	2238A	1	Hazardous Solids	118	
ADM Corn Sweetener	2238A	1	Hazardous Solids	119	
ADM Vitamin E	2235A	1	Hazardous Solids	76	passed flammable

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SAGEET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
CIPS	1114A	13	Non Haz Ethylene Glycol	110	
CIPS	1114A	13	Non Haz Ethylene Glycol	109	
CIPS	1114A	13	Non Haz Ethylene Glycol	108	
CIPS	1114A	13	Non Haz Ethylene Glycol	107	
CIPS	1114A	13	Non Haz Ethylene Glycol	113	
CIPS	1114A	13	Non Haz Ethylene Glycol	114	
CIPS	1114A	13	Non Haz Ethylene Glycol	115	
CIPS	1114A	13	Non Haz Ethylene Glycol	116	
Northrop	1207A	13	Non Haz Ethylene Glycol	112	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	15	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	16	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	17	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	18	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	20	
ADM Corn Sweetners	1619A	3	Non Hazardous Solids	27	
ADM Mechanical	1669D	4	Non Hazardous Solids	43	
Nascote	2243C	7	Non Hazardous Solids	66	
Sligo	1784A	7	Non Hazardous Solids	67	
National Graphics	2033D	3	Non Hazardous Solids	64	
National Graphics	2033B	3	Non Hazardous Solids	65	
National Graphics	2033D	3	Non Hazardous Solids	69	
ADM East	2040A	1	Non Hazardous Solids	6	
ADM Fabrication	1370A	2	Oxidizing Solid	Not found	Not Found
ADM Fabrication	1370A	13	Oxidizing Solid	14	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	49	PERCHLOT
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	50	PCE
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	51	Maybe extremely haz
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	52	

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SARGEY, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	111	
Nascote	2242A	13	Hazardous Solids	110	
Nascote	2242A	13	Hazardous Solids	109	
Nascote	2242A	13	Hazardous Solids	108	
Nascote	2242A	13	Hazardous Solids	72	
Nascote	2242A	13	Hazardous Solids	73	passed oxidizer test
Nascote	2242A	13	Hazardous Solids	74	
ADM Fabrication	1367C	13	Hydrochloric Acid	13	
ADM Fabrication	2072C	13	Hydrochloric Acid	Not found	Not found
Scientific Associates	2072C	13	Lab Pac Hg	36	
RRG Internal	Internal	6	Line Flush from Reclaim	56	
RRG Internal	NA	1	Line Flush From Reclaim Perc		
Parkway School	2251A	6	Liquid Fuel	53	passed oxidizer test
Republic	1024A	1	Liquid Fuel Water w/Ag/CN	80	
Republic	1024A	1	Liquid Fuel Water w/Ag/CN	99	
Republic	1024A	1	Liquid Fuel Water w/Ag/CN	81	passed cyanide
National Graphics	2031A	13	Methylethanolamine	10	
National Graphics	2031A	13	Methylethanolamine	39	
Builders Square	2206A	13	Muriatic Acid	38	
Illinois Engraving	1303A	13	Nitric Acid	24	passed corrosive test
Illinois Engraving	1787A	13	Nitric Acid	35	
National Graphics	2032B	13	Nitric Acid		
ADM Fabrication	1367A	13	Nitric Acid/Sulfuric Acid O/P	28	
ADM Fabrication	1367A	13	Nitric Acid/Sulfuric Acid O/P	44	
EnviroVac	1199A	4	Non Haz Ethylene Glycol	42	
CIPS	1114A	13	Non Haz Ethylene Glycol	111	

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SAUGEY, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	58	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	59	PCE
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	60	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	61	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	62	
St. Louis Parks	633B	4	Soap Water	41	
National Graphics	2032A	13	Sodium Hydroxide	11	
Petrolite	2119A	13	Sodium Hydroxide	30	
ADM Fabrication	1367D	13	Sodium Nitrate	23	
RRG	not labeled	3	Waste Solids	no label	
RRG	not labeled	3	Flammable	no label	
RRG	not labeled	3	Waste Solids	no label	
Label Scratched	Can't Read	3	Hazardous Solid	no label	
RRG	not labeled	6	Sludge Accumulation	48	not labeled
National Graphics	2032B	6	Nitric Acid	63	5 gallon bucket
National Graphics	2032D	7	Non Hazardous Liquid	68	
Generator Unknown	2070A	8	Flammable Liquid	no label	
RRG	not labeled	south room	Flammable Liquid	122	5 gallon bucket
RRG	not labeled	south room	Floor Dry	121	1 gallon
ADM Fabrication	1367B	13	Caustic Soda	4	1 gallon
National Graphics	2032A	13	Sodium Hydroxide	12	
RRG	1279A	collection area	Sampling Jars	Not found	Collection Area
RRG	NA	see comments	Approximately 2,536 Sampling Jars in boxes and jars	Not found	Located on southwest/southeast wall.

Key PDS NO. = A number found on the drums and corresponds to RRG weekly drum inventory.

Table 4-10

EAST STORAGE BUILDING INVENTORY
CLAYTON CHEMICAL SITE ANALYSIS
SAUGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

TYPE OF MATERIAL	NUMBER OF ITEMS	Comments
Antifreeze	8	55 Gallon Drums
Gasoline	3	55 Gallon Drums
Activated Carbon	2	55 Gallon Drums
Reactive Carbon	10	55 Gallon Drums
Carbon Powder	1	55 Gallon Drums
Ethylene Glycol	1	55 Gallon Drum
Potassium Carbonate	25	Bags
Unknowns	3	55 Gallon Drums
Compressed Gas	1	Cylinder
Nitrogen Cylinder	3	Cylinders

Table 4-11

**BOILER GARAGE BUILDING INVENTORY - TANK, DRUM, CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SAUGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001**

TYPE OF MATERIAL	NUMBER OF ITEMS	Comments
Unknown Solid	1	5 gallons
Miscellaneous Boiler Chemicals	1	35 gallons
Miscellaneous Boiler Chemicals	1	55 gallons
Fiber Drum Solid Desiccate	1	35 gallons
Drum of Sodium Hexamethphospahte	1	35 gallons
Boiler Feed Water Treatment	1	20 gallons
Lube Oil Dispenser	1	Unknown
Bags Water Softener Salt	25	Bags
Oxygen Scavenger Cornsive	1	20 gallons
Mole Sene	13 Drums	All Full
Sodium Bisulfate	1	liquid
Isopropanol	1	3/4 full UN1219
Morpholine	1	drum
Spent Carbon	6	used for absorption
Caustic Substances	35	in plastic buckets. In over-pack. For cleaning
10% Sulfuric Acid	1	drum
Robinol N-10	1	Non-Haz
Amonium Hydroxide	1	drum
Dry Solids	1	drum
Oakite boiler treatment	1	appears to be leaking - busted
Uknown	1	could not open/possible hazardous. No markings
Caustic Substances	3	in plastic buckets. In over-pack. For cleaning
Boiler treatment	2	5 gallons. Half full
Colling tower treatment	1	5 gallons

Table 4-12

LABORATORY INVENTORY
CLAYTON CHEMICAL SITE ANALYSIS
SAUGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

TYPE OF MATERIAL	# OF ITEMS	Comments
Methane calibration gas	1	
ACE Floe	3	
Isopropyl Alcohol	1	
Phenolphthalein	1	
2N	1	1 gallon
50% Sodium Hydroxide	1	
Miscellaneous Lab material	150	Chromium, Sodium, Manganese, Mercuric Nitrate, Silver in Solution, Silver Reference Solution, Selenium, Mercury 100ppm Solution, Custom Multi Element Solution, Zinc in Solution, ECT - Located in Center of room
Sodium Bisulfite		The materials were on the north wall in lower cabinet. There were approximately 70 containers. These are the few that are listed.
Potassium Hydrogen Phthalate		
Potassium Chloride		
Sodium Dichromate		
Phenolphthalein		
Bromine		
Miscellaneous samples	9	Located on west wall drawer.
Nitric Acid	10	Acid Storage Area
Hydrochloric Acid	5	
Phenolphthalein	5	
Sulfuric Acid	5	
Hydrogen Peroxide	5	
Acetone	1	Above Acid Storage
Isobutanol	1	
Miscellaneous samples	4	
Hexane	1	Northwest corner lower cabinet.
Acetone	1	
Miscellaneous samples	20	Liquid samples

Exhibit B

DRUMS										PAGE 1
STORAGE AREA	WASTE DESCRIPTION	QUANTITY	UNIT COST	METHOD OF TREATMENT	COST	REMARKS				
Drum Building	Acids & Alkalies	25	\$250.00	Aqueous Treatment	\$8,250.00					
Drum Building	Hazardous D, F Codes	48	\$210.00	Fuel Blending/BIF Fuels	\$10,080.00					
Drum Building	Non-Hazardous	34	\$200.00	Fuel Blending/Sublille D	\$6,800.00					
Drum Building	Mercury (Hg)	1	\$460.00	Recovery	\$460.00					
Drum Building	Oxidizer	1	\$250.00	Reduction	\$250.00					
Drum Building	Perchloroethylene	11	\$250.00	Reclamation	\$2,750.00					
Lab	Sample Compilations	1	\$500.00	Incineration	\$500.00					
Drum Transportation		121			\$27,090.00					
SUBTOTAL					\$30,090.00	Average cost per drum-\$248.68				
BULK LIQUIDS (Hazardous)										
T-RC	Blended Fuels	7,140	\$1.75	Incineration	\$12,495.00	Low BTU; High Water				
T-52	Blended Fuels	3,483	\$1.75	Incineration	\$6,095.25	High %Cl				
T-51	D001 Wastewater	6,433	\$1.75	Incineration	\$11,257.75	High Water				
T-46	Dilute Perchloroethylene	1,392	\$1.75	Incineration	\$2,436.00	Low BTU; High %Cl				
S-1	F002 Wastewater	8,793	\$1.75	Incineration	\$15,387.75	No BTU; High Water				
S-2	D001 Wastewater	9,206	\$1.75	Incineration	\$16,110.50	No BTU; High Water				
S-3	MEK	4,306	\$0.45	BIF fuels	\$1,937.70	High BTU; Low Water				
S-4	D001 Wastewater	7,908	\$1.75	Incineration	\$13,839.00	Low BTU; High Water				
S-8	Dilute Perchloroethylene	3,800	\$1.75	Incineration	\$6,650.00	High %Cl				
SUBTOTAL		52,461			\$86,208.95					
BULK LIQUIDS (Non Hazardous)										
S-5	Oil/Water	9,029	\$0.38	Separation/Stripping	\$3,431.02					
T-11	Oil/Water	22,747	\$0.38	Separation/Stripping	\$8,643.86					
T-12	Oil/Water	26,384	\$0.38	Separation/Stripping	\$10,029.72					
T-13	Oil/Water	26,247	\$0.38	Separation/Stripping	\$9,973.86					
T-14	Oil/Water	22,976	\$0.38	Separation/Stripping	\$8,730.88					
T-33	Oil/Water	4,537	\$0.38	Separation/Stripping	\$1,724.06					
T-37	Oil/Water	5,625	\$0.38	Separation/Stripping	\$2,137.50					
T-17	Oil/Water	5,437	\$0.38	Separation/Stripping	\$2,066.06					
T-41	Oil/Water	5,397	\$0.38	Separation/Stripping	\$2,050.86					

STORAGE AREA	WASTE DESCRIPTION	QUANTITY	UNIT COST	METHOD OF TREATMENT	COST	REMARKS
T-45	Oil/Water	1,536	\$0.38	Separation/Stripping	\$583.68	
T-46	Oil/Water	2,754	\$0.38	Separation/Stripping	\$1,046.52	
T-44	Oil/Water	5,256	\$0.38	Separation/Stripping	\$1,997.28	
B-1	Oil/Water	16,638	\$0.38	Separation/Stripping	\$6,322.44	
B-2	Oil/Water	15,576	\$0.38	Separation/Stripping	\$5,918.88	
B-4	Oil/Water	18,402	\$0.38	Separation/Stripping	\$6,232.76	
G-2	Oil/Water	32,144	\$0.38	Separation/Stripping	\$12,214.72	
G-3	Oil/Water	241,200	\$0.38	Separation/Stripping	\$91,656.00	
G-4	Crude Oil	70,300	\$1.43	Landfill Disposal	\$100,529.00	Very Thick Material
G-5	Oil/Water	169,760	\$0.38	Separation/Stripping	\$64,508.80	
G-6	Oil/Water	19,116	\$0.38	Separation/Stripping	\$7,264.08	
G-7	Oil/Water	18,408	\$0.38	Separation/Stripping	\$6,995.04	
G-8	Oil/Water	20,886	\$0.38	Separation/Stripping	\$7,936.68	
G-9	Oil/Water	16,933	\$0.38	Separation/Stripping	\$6,434.54	
G-10	Oil/Water	21,535	\$0.38	Separation/Stripping	\$8,183.30	
G-11	Oil/Water	23,452	\$0.38	Separation/Stripping	\$8,911.76	All contents (23,452 gallons) transferred to G-5 to mitigate leak on 8/1/98.
SUBTOTAL		820,285			\$385,523.30	
				Additional Equip.	\$31,000.00	
				Laboratory Expens.	\$5,000.00	
				Sludges	\$75,000.00	
				Consumables	\$5,000.00	
				PROJECT TOTAL	\$617,822.25	

PAGE 2

EXHIBIT C

POTENTIAL PRPs

- G. M. & O. Railroad (Maintenance Yard) (1950s)
- Still Bottom Disposal Pit (1961-1980)
- Clayton Chemical (1980-1996)
- Resource Recovery Group (1996-1998)
- Environmental Operations, Inc., St. Louis, MO (Owner)
- Specialty Waste Services, Inc., Alton, IL (Owner)
- Mr. Hopson - Owner
- Mr. Hilse - Owner
- Mr. T. Hippensteel – Owner
- Mr. D. Wrobel – Owner
- Mr. G. Snider – Owner
- Mr. L. Stock – Owner
- Environmental Waste Services, Aurora, IL
- Emerald Environmental (Purchased Clayton – 1993)
- Village of Sauget, IL (Deed Property)
- Ozinga Transport
- Clark Oil Refining, IL
- Philips Pipe Line, St. Louis
- Monsanto Chemical
- Enclean Transport
- Schiber Truck
- Northeast Chemical (Purchased Clayton – 1991)
- Pipeline Cleaners, Kansas City
- Texas Pharmaceutical
- Over 1000 Small Quantity Generators Transported Waste to the Site

Exhibit D

Clayton Chemical Site Revised Final Volumetric Ranking 2/25/02

Notes:

- The Generator Name is the name listed on the Illinois Environmental Protection Agency Hazardous Waste Reports from 1995-1998.
- The Liabe Company Name is the current name of the likely generator.
- The LC ID (or Liabe Company ID) number represents a unique identification number assigned to individual parties. Individual parties were identified from the party name and address information provided on the Illinois EPA Hazardous Waste Reports. Approximately 900 liabe companies were identified. A 10,000 series number was assigned to groups of parties for data organizational purposes only. For example, if one party generated waste from more than one address, that party's wastes were combined and the party was assigned a group number in the 10,000 series. This process permits the historical tracking of the originally assigned LC ID numbers. There are not 10,000 liabe companies.
- Conversion information is contained at the end of this list.

LC ID	LIABE COMPANY NAME	GENERATOR NAME	CALC VOLUME-GALLONS
190	DAIMLERCHRYSLER CORPORATION	CHRYSLER CORP.	541610
562	NASCOTE INDUSTRIES, INC.	NASCOTE INDUSTRIES	368485
495	MALLINCKRODT INC.	MALLINCKRODT CHEMICAL	283639
10	AAD DISTRIBUTION AND DRY CLEANING SERVICES, INC.	AAD DISTRIBUTION AND DRY CLEANING SERVICES, INC.	267637
790	TEVA PHARMACEUTICALS USA, INC.	TEVA PHARMACEUTICALS USA EPC DIVISION	249419
779	THE SWAN CORPORATION	SWAN CORPORATION	229518
489	LYON METAL PRODUCTS, LLC	LYON METAL PRODUCTS INC.	161625
640	PURETHANE, INC. - WHY DROPPED FROM LIST?	PURETHANE, INC.	155163
565	NATIONAL COATINGS INC	NATIONAL COATINGS INC	151135
776	SUPERIOR EQUIPMENT CO., INC.	SUPERIOR EQUIPMENT CO	129413
506	MCINTYRE GROUP, LTD.	MCINTYRE GROUP	84470
767	STERLING LACQUER MANUFACTURING COMPANY	STERLING LACQUER MANUFACTURING COMPANY	71981
490	NORDENIA U.S.A., INC.	M & W PACKAGING USA	66738
61	ARRIS INTERNATIONAL, INC.	ANTEC MANUFACTURING	45197
551	MORTON METALCRAFT	MORTON METALCRAFT	41681
836	LEAR CORPORATION AUTOMOTIVE SYSTEMS	UNITED TECHNOLOGIES AUTOMOTIVE	29194
258	DOW SCREW PRODUCTS	DOW SCREW PRODUCTS	26976
795	KNAPHEIDE EQUIPMENT CO.	THE KNAPHEIDE MANUFACTURING CO	26160
10026	WARECO SERVICE INC.		24841
48	AMBASSADOR BUILDINGS	AMBASSADOR BUILDINGS	22332
10002	ARCHER DANIELS MIDLAND CO.		21839
328	DJR HOLDINGS, INC.		20680
623	BAKER PETROLITE CORPORATION	FUTURA COATINGS	19589
459	KOMATSU AMERICA INTERNATIONAL CO.	PETROLITE CORPORATION	18009
172	CERRO COPPER PRODUCTS	KOMATSU AMERICA INTERNATIONAL CO.	17186
819	TRUE MANUFACTURING CO., INC.	CERRO COPPER PRODUCTS	13914
570	NESCO CONTAINER CORPORATION	TRUE MANUFACTURING	11335
605	PARSONS COMPANY INC	NESCO	10925
441	K & R WOOD PRODUCTS, INC.	PARSONS INC	10195
35	AGI INCORPORATED - WHY DROPPED FROM LIST?	K & R WOOD PRODUCTS	10027
917	QUEST DIAGNOSTICS CLINICAL LABORATORIES, INC.	AGI INCORPORATED	10010
614	PENN ALUMINUM	SMITHKLINE BEECHAM CLINICAL LABORATORIES, INC	9855
		PENN ALUMINUM	

UNDELETED
10,000
RCRA WASTE

ENFORCEMENT CONFIDENTIAL

900 Liabe Companies identified

FILED LIST 2/25/02 (17 PAGES)

2ND LIST 8/8/02



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

November 22, 2004

REPLY TO THE ATTENTION OF:

VIA FEDERAL EXPRESS

RRG Clayton Chemical Site (soil
removal)

Mr. R. P. Washington, Chairman
Lyon Workspace Products, LLC
420 North Main Street
Montgomery, IL 60538

Re: Clayton Chemical Site General Notice of Potential Liability
letter.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site, and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

The U.S. EPA is currently planning to conduct the following actions at the above referenced Site:

1. Develop and implement a site health and safety plan;
2. Provide security for the site;

3. Sample, characterize, and consolidate for removal and disposal all contaminated soils found on-site, all solids found in tanks (a.k.a. tank bottoms) and any other hazardous waste solid material found on-site;
4. Transport and dispose of all characterized hazardous substances, pollutants, wastes, or contaminants at a RCRA approved disposal facility in accordance with the U.S. EPA Off-Site Rule, 40 CFR 300.440.
5. Backfill the excavated site areas with clean material and topsoil. Restore and vegetate excavated areas to prevent soil erosion.

U.S. EPA has received information that you may be a potentially responsible party (PRP) at this Site. The information used by U.S. EPA in part to make this determination was provided by the group of PRPS that conducted the initial liquids removal action at this Site. The report used by U. S. EPA titled "The RRG/Clayton Liquids Removal, Investigation Report" included a volumetric ranking of PRPs that may have sent liquids, solids and or other material to be processed at the Site. Based on U.S. EPA's review and analysis of the volumetric ranking in that report; the Agency is notifying all PRPs that sent or contributed 75,000 gallons or more to the Site that they are PRPs. This group consists of only 73 of the approximate 2,800 PRPs that sent material to this Site to be processed. However, U.S. EPA calculations indicate that the initial group of 73 PRPs contributed over 72% of the wastes processed at the Site.

The Agency's decision to initially only Notice the 73 largest PRPs at this Site is based on a number of factors. First, U. S. EPA wants to begin a removal action at this Site as soon as possible and having a limited number of PRPs in the group will make this possible. Second, EPA believes that having the small initial group of 73 PRPs will make it easier for them to come to agreement and decisions on the many actions that need to be made during the course of the Site clean up. Finally, U. S. EPA plans to notice the remaining PRPs identified in the aforementioned report but would like input from this initial PRP group on how best to notify them of their responsibility for this Site.

U.S. EPA is inviting the initial group of 73 PRPs to meet with Agency officials on either Tuesday, December 7, 2004, at 1:00 p.m. or on Wednesday December 8, 2004 at 10:00 a.m. Both meetings will be held at the East St. Louis Public Library 5300 State Street, East St. Louis, Illinois 62203. It is only necessary to attend one of the meetings.

By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a PRP, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days after the December 8, 2004 PRP meeting, regarding your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you or your organization does not wish to negotiate a resolution of its potential responsibility in connection with the Site and that you or your organization has declined any involvement in performing the response activities.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions. Your response should be sent to:

Tom Turner
Associate Regional Counsel
U.S. EPA - Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, Illinois 60604

If you need further information regarding this letter, you may contact Tom Turner of the Office of Regional Counsel at, (312) 886-6613.

Due to the nature of the problem at this site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frame specified herein. We hope you will give this matter your immediate attention.

Sincerely,



Thomas Geisheider, Acting Chief
Emergency Response Branch

Attachment: A-General Notice PRP list.

APPENDIX A

List of Potential Responsible Parties Receiving a General Notice Letter for the RRG Clayton Chemical Site (Soil Removal)

NASCOTE INDUSTRIES, INC.
Margaret A. Coughlin Esq.
Dickinson Wright, PLLC
38525 Woodward Ave., Suite 2000
Bloomfield Hills, MI 48304-2970

FORD MOTOR COMPANY
Sir Nicholas V. Scheele, President
Ford Motor Company
One American Road
Dearborn, MI 48126

SIGMA-ALDRICH CORPORATION
Mr. Jai Nagarkatti, President
Sigma-Aldrich Corporation
3050 Spruce Street
St. Louis, MO 63103

MALLINCKRODT INC.
Mr. Peter S. Strassner
Thompson Coburn LLP
One US Bank Plaza
St. Louis, MO 63101-1693

BLISS WASTE OIL COMPANY
Mr. Jerry Bliss, Owner
Bliss Waste Oil Company
149 Strecker Road
Ballwin, MO 63011

A-1 OIL CORPORATION
Mr. Jerry Bliss, Registered Agent
A-1 Oil Corporation
149 Strecker Road
Ballwin, MO 63011

DAIMLERCHRYSLER CORPORATION
Mary Ericson Waters
Daimler-Chrysler Corporation
1000 Chrysler Drive
CIMS 482-13-62
Auburn Hills, MI 48326-2766

LEAR CORPORATION
Mr. Robert E. Rossiter, President
Lear Corporation
21557 Telegraph Road
Southfield, MI 48034

U.S. PAINT CORPORATION
Mr. John Duchardt, President
U.S. Paint Corporation
831 South 21st Street
St. Louis, MO 63103

STERLING LACQUER MANUFACTURING COMPANY
Mr. Leo V. Mitchell, President
Sterling Lacquer Manufacturing Company
3150 Brannon Ave.
St. Louis, MO 63139

SUPERIOR EQUIPMENT COMPANY, INCORPORATED
Bruce A. Morrison Esq.
Green, Hennings & Henry, LLP
705 Olive Street, Suite 614
St. Louis, MO 63101-2208

THE SWAN CORPORATION
Greensfelder, Hemker & Gale, P.C.
2000 Equitable Building
10 South Broadway
St. Louis, MO 63102-1774

PLASTIC PRODUCTS CO., INC.
Ms. Marlene Messin, President
Plastic Products Co., Inc.
30355 Akerson Street
Lindstrom, MN 55045

HUSSMAN CORPORATION
Mr. Randy Smith, President
Hussman Corporation
12999 St. Charles Rock Road
Bridgeton, MO 63044

UOP LLC
Mr. Carlos Guimaraes, President
UOP LLC
25 East Algonquin Road
Building A
Des Plaines, IL 60016

NATIONAL COATINGS INC.
S. David Simpson
Hattery, Simpson & West
Suite 402 Hill Arcade
Galesburg, IL 61402

CERRO FLOW PRODUCTS, INC.
Richard F. Ricci Esq.
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, NJ 07068-1791

NORTH EAST RECYCLING TRANSPORTATION, INC.
James P. Oliver Esq., Registered Agent
Squire, Sanders & Dempsey L.L.P.
for North East Recycling Transportation, Inc.
4900 Key Tower, 127 Public Square
Cleveland, OH 44114

OLIN CORPORATION
Mr. Joseph D. Rupp, President
Olin Corporation
501 Merritt 7
Norwalk, CT 06856

MONSANTO COMPANY
Mr. Hugh Grant, President
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

NORFOLK SOUTHERN RAILWAY COMPANY
Mr. Charles W. Moorman, President
Norfolk Southern Railway Company
3 Commercial Place
Norfolk, VA 23510

SEQUA CORPORATION
Mr. Norman E. Alexander, Chief Executive Officer
Sequa Corporation
200 Park Avenue
New York, NY 10166

BOBEN MANUFACTURING COMPANY
Mr. Robert H. Slosberg, Registered Agent
Boben Manufacturing Company
11 Nantucket Ln.
St. Louis, MO 63132

AAD DISTRIBUTION & DRY CLEANING SERVICES, INC
Mr. Hormoz Pourat c/o Ms. Paula Silverbush Pourat
for AAD Distribution and Dry Cleaning Services, Inc.
5107 Enfield Avenue
Encino, CA 91316

TEVA PHARMACEUTICALS USA, INC.
Gail S. Port Esq.
Proskauer Rose, LLP
1585 Broadway
New York, NY 10036

DIOSYNTH, INC.
Mr. C. Nederveen, President
Diosynth, Inc.
2136 South Wolf Road
Des Plaines, IL 60018

COLEMAN CHEMICAL, INC.
Mr. Albert R. Puntureri, President
Coleman Chemical, Inc.
75 Sanger St.
Peoria, IL 61602

TNEMEC COMPANY, INC.
Mr. Peter F. Cortelyou, President
Tnemec Company, Inc.
6800 Corporate Dr.
Kansas City, MO 64120

MCINTYRE GROUP, LTD.

Eric E. Boyd Esq.
Seyfarth Shaw LLP
55 E. Monroe St., Suite 4200
Chicago, IL 60603

EXXONMOBIL OIL CORPORATION

Mr. Rex W. Tillerson, President
ExxonMobil Oil Corporation
5959 Las Colinas Blvd.
Irving, TX 75039-2298

CHICAGO DRUM, INC.

Mr. Buddy Ross, President
Chicago Drum, Inc.
6829 Flintlock Road
Houston, TX 77040

UNIVERSAL PACKAGING CORPORATION

Ms. Gloria Cobb, President
Universal Packaging Corporation
4761 Moline Street
Denver, CO 80239

WALKER PADUCAH CORP.

Mr. Craig E. Philips, President
Walker Paducah Corp.
4400 Harding Road
Nashville, TN 37205

SAFETY-KLEEN SYSTEMS, INC.

Frederick J. Florjancic Jr., President & CEO
Safety-Kleen Systems, Inc.
5400 Legacy Dr.
Cluster II, Bldg. 3
Plano, TX 75024

KEYSTONE CONSOLIDATED INDUSTRIES, INC.

Mr. David Cheek, President
Keystone Consolidated Industries, Inc.
dba Keystone Steel & Wire Company
7000 SW Adams St.
Peoria, IL 61641

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY

Mr. Gary L. Rainwater, President
Central Illinois Public Service Company
One Ameren Plaza
1901 Chouteau Avenue
St. Louis, MO 66149

LYON METAL PRODUCTS, L.L.C.

Patrick M. Kinnally Esq.
Kinnally, Krentz, Loran, Hodge & Herman, P.C.
for Lyon Metal Products LLC
Aurora, IL 60507-5030

RILEY BROTHERS COMPANY

Mr. James S. Jennison, President
Jennison Industries, Inc.
on behalf of Riley Brothers Company
106 Washington Avenue
Burlington, IA 56201

TITAN WHEEL CORPORATION OF ILLINOIS

Mr. Ronald B. Schildt, President
Titan Wheel Corporation of Illinois
2701 Spruce Street
Quincy, IL 62301

SILGAN CONTAINERS CORPORATION

Mr. James D. Beam, President
Silgan Containers Corporation
21800 Oxnard St., Suite 600
Woodland Hills, CA 91367

INX INTERNATIONAL INK COMPANY

Mr. Richard Clendenning, President
INX International Ink Co.
651 Bonnie Lane
Elk Grove Village, IL 60007

PENN ALUMINUM INTERNATIONAL, INC.

John Nichols
Penn Aluminum International, Inc.
1117 North 2nd St.
Murphysboro, IL 62966

AFTON CHEMICAL CORPORATION
Mr. C. S. Warren Huang, President
Afton Chemical Corporation
500 Spring St.
Richmond, VA 23219

KOCH INDUSTRIES, INC.
Mr. Joseph Moeller, President
Koch Industries, Inc.
4111 E. 37th St. North
Wichita, KS 67720

BEMIS COMPANY, INC.
Mr. Jeffrey Curler, President
Bemis Company, Inc.
222 S. 9th St.
Suite 2300
Minneapolis, MN 55402

VALENTEC WELLS, LLC
President
Valentec Wells, LLC
Lake City Army Ammunition Depot
Building 2
Independence, MO 64051

STEELCOTE MANUFACTURING COMPANY
Mr. John Milner, President
Steelcote Manufacturing Company
One Steelcote Square
St. Louis, MO 63103

AMERICAN RECREATION PRODUCTS, INC.
Mr. George J. Grabner Jr., President
American Recreation Products, Inc.
1224 Fern Ridge Parkway
St. Louis, MO 63141

BAKER PETROLITE CORPORATION
Ms. Halina E. Caravello
Baker Petrolite Corporation
12645 West Airport Blvd.
Sugar Land, TX 77478

CHEMISPHERE CORPORATION
Mr. Robert F. Schwent, President
Chemisphere Corporation
2101 Clifton Ave.
St. Louis, MO 63139

IMPERIAL HOME DECOR GROUP, INC.
Mr. Douglas R. Kelly, President
Imperial Home Decor Group, Inc.
23645 Mercatile Rd.
Cleveland, OH 44122

MARCHEM CORPORATION
Mr. Sandon L. Wool, President
Marchem Corporation
2500 Adie Rd.
Maryland Heights, MO 63043

DON V. DAVIS COMPANY
Ms. Ophelia Davis, Owner
Don V. Davis Company
5955 Goodfellow Blvd.
St. Louis, MO 63147

CURWOOD, INC.
Mr. Tom Sall, President
Curwood, Inc.
2200 Badger Ave.
Oshkosh, WI 54903

THE KANSAS CITY SOUTHERN RAILWAY
COMPANY
Mr. Michael Haverty, President
The Kansas City Southern Railway Company
427 W. 12th St.
Kansas City, MO 64121

ARRIS INTERNATIONAL, INC.
Mr. Randy Brogdon Esq.,
Troutman Sanders LLP
for Arris International, Inc.
600 Peachtree St., Ste. 5200
Atlanta, GA 30308-2216

SAFETY-KLEEN (TS), INC.
Mr. David M. Sprinkle, President
Safety-Kleen (ts), Inc.
5400 Legacy Dr.
Cluster II, Bldg. 3
Plano, TX 75024

THE DOW CHEMICAL COMPANY
Mr. Andrew N. Liveris, President
The Dow Chemical Company
2030 Dow Center
Midland, MI 48674

LYON WORKSPACE PRODUCTS, LLC
Mr. R. P. Washington, Chairman
Lyon Workspace Products, LLC
420 North Main Street
Montgomery, IL 60538

METAL CONTAINER CORPORATION
Mr. Joseph P. Sellinger, President
Metal Container Corporation
One Busch Place
St. Louis, MO 63118

CROWN BEVERAGE PACKAGING, INC.
Mr. Robert J. Truitt, President
Crown Beverage Packaging, Inc.
One Crown Way
Philadelphia, PA 19154

DJR HOLDINGS, INC.
Mr. Rodney D. Jarboe, President
DJR Holdings, Inc.
1019 Skinker Parkway
Hazelwood, MO 63042

MITSUBISHI MOTORS NORTH AMERICA, INC.
Mr. Pierre M. Gagnon, President
Mitsubishi Motors North America, Inc.
6400 Katella Ave.
Cypress, CA 90630

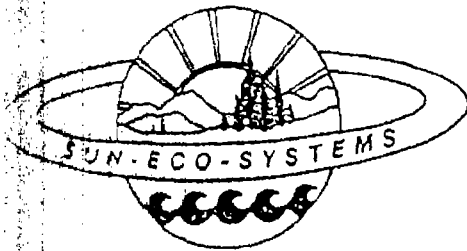
SUPERIOR OIL CO., INC.
Mr. Ray Roembke Jr., President
Superior Oil Co., Inc.
400 W. Regent St.
Indianapolis, IN 46225

NORDENIA U.S.A., INC.
Julie O'Keefe Esq.,
Armstrong Teasdale, LLP
for Nordenia U.S.A., Inc.
One Metropolitan Square, Suite 2600
St. Louis, MO 63102-2740

ALLIED HEALTHCARE PRODUCTS, INC.
Mr. Earl R. Refsland, President
Allied Healthcare Products, Inc.
1720 Sublette Ave
St. Louis, MO 63110

CONOPCO, INC.
Mr. Charles B. Strauss, President
Conopco, Inc.
700 Sylvan Ave.
Englewood Cliffs, NJ 07632

LINCOLN INDUSTRIAL CORPORATION
Mr. Mark T. Schroepfer, President
Lincoln Industrial Corporation
One Lincoln Way
St. Louis, MO 63120



BILL,

WOULD YOU HAVE SOMEONE
GET BACK TO ME MOLE' ON
THIS — AND LET ME KNOW.

Sun Eco Systems, Inc

X

CHICAGO OFFICE:

7949 W. Country Club Ln.

Elmwood Park, IL 60707

Phone: (708) 452-5975

Fax: (708) 452-5975

THANKS

TOM

8/19/05

□

PHOENIX OFFICE:

14518 Morning Star Trail

Surprise, AZ 85374

Phone: (623) 975-9565

Fax: (623) 975-9565

Fax Transmission

To: TOM GEISHECKERFrom: PHIL MOLE'Date: 8-18-2005Fax No. 312-353-9773/312-353-9176Number of Pages 6 (Including Cover Page)Comments: RE: CLAYTON CHEMICAL/RRG

I WOULD APPRECIATE A RESPONSE
TO MY LETTER OF 2-21-2005 AS
IT CONCERNS THE SUBJECT SITE
ITEMS #1 THRU #8
THANK YOU FOR YOUR
COOPERATION.

Philip J. Molé and Associates

Certified Environmental Engineers

Serving Your Priority • Reduce Liabilities

EC
2/21/051520 Kensington Road
Oak Brook, Illinois 60451
Phone: (708) 584-1100
Fax: (708) 584-1101
www.mostardi-platt.com

February 21, 2005

Mr. Thomas Geishecker
Acting Chief
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Lyon Workspace Products, LLC (Lyon), Montgomery, Illinois
RRG/Clayton Chemicals Site, Sauget, Illinois
Response to Letter Dated November 22, 2004
General Notice of Potential Liability

Dear Mr. Geishecker:

Please be advised that Mostardi Platt Environmental (MPE) is retained on a continuous basis to manage the environmental affairs of Lyon Metal Products, LLC, 420 North Main Street, Montgomery, Illinois 60538, as it concerns the subject matter.

An in-depth review, evaluation/analysis of the historical documents, file reports, site assessments, manifests, multimedia inspections conducted by the U.S. Illinois Environmental Protection Agency (USEPA), Illinois Environmental Protection Agency (IEPA), Sauget Task Force, and Clayton Chemical has been investigated. MPE believes the record of facts and exhibits submitted will technically support and establish that Lyon, a potentially responsible party (PRP) in the USEPA November 22, 2004 general notice letter, had little or no environmental impairment at the site.

Although Lyon did not participate in the Phase I liquids cleanup, a third-party resolution and monetary settlement was reached in which Lyon denies contributing to the release or threatened release of hazardous substances, pollutants, and contaminants at the above-referenced site, and therefore, would not have an impact on the Phase II soil remediation.

For the record, MPE submits the following for justification for delisting Lyon as a PRP.

Inspection Audits by USEPA and IEPA

1. The IEPA and USEPA conducted inspections on six occasions over the protracted period of time. In each instance, no Lyon containers, drums, or totes were identified. The solvent (toluene) paint flush product was reclaimed and immediately returned to Lyon as

U.S. Environmental Protection Agency
MPE Project M023401
February 21, 2005
Page 2

recycled solvent under a bill of lading in commerce. Lyon did not characterize this product as a hazardous waste but a return on investment, a valuable resource conservation management effort, in the spirit and intent of the RCRA Act. The content of the paint flush is estimated at 5 to 10% resin, 90 to 95% toluene. Considering a conventional 90% distillation efficiency =

161,625	= Gallons Shipped (Paint Flush)
<u>-16,162</u>	= Resin Content
145,463	= Gallon Solvent Toluene
 145,463	
<u>-14,546</u>	= 10% Residue (Kiln Fuel)
130,917	= Gallons Toluene Reclaimed

Based on the above, Lyon is requesting that proper credits be issued for its regulatory waste minimization efforts and reclassify and adjust Lyon's volumetric ranking to a total of 14,546 gallons, well under the 75,000 gallons volumetric ranking of PRPs.

2. A review of Section 5 – Generators, Quantitative Data of 1979-98, indicates a Lyon total of 250,815 gallons. Lyon records do not concur with this total, and is overstated by 89,190 gallons (exhibit).
3. Roy F. Weston, Inc. (Weston) and Project Resources, Inc. (PRI) were retained under USEPA Superfund Technical Assessment and Response Team (START) Contract 68-00-10 to perform a liquid removal site evaluation of drums, tanks, containers, sampling and reviewing the analytical data at the RRG site. All hazcat activities were conducted under the authority of the USEPA on-scene coordinator on June 5 through June 7, 2000. The drum team inventory summaries were found in Table 4-9 through 4-12 of the report. A review of these tables did not indicate and/or identify Lyon product at the site (exhibit).
4. On May 13 and 14, 1997, an inspection was conducted at the subject facility by the USEPA, IEPA, and the American Bottoms Regional Wastewater Treatment Plant. The inspection did not indicate or identify any Lyon drums (exhibit).
5. On May 28, 2003, Enviro-Vac, Jacksonville, Illinois, submitted a bid proposal to the PRP Participation Group to remove the liquid waste inventory. The scope of work (SOW) included liquid removal of all tanks and drums, etc. The drum storage area inventory did not indicate or identify any Lyon drums (exhibit).

U.S. Environmental Protection Agency
 MPE Project M023401
 February 21, 2005
 Page 3

6. Lyon contracted with Environmental Waste Services (EWS) to purchase the reclaimed solvent. EWS did arrange for the transport and treatment to Clayton Chemical RRG TSD facility. The reconstituted product purchased from EWS (broker) was legally in accordance with the RCRA, EPA and OSHA labeling requirements. Lyon was issued a material safety data sheet (MSDS) with each delivery. EWS assumed title custody and responsibility for all paint flush. Lyon did not arrange or pay for the transport and treatment. EWS is a permitted RCRA hazardous waste management facility as defined (35 IAC) 70.110 (exhibit). A certificate of destruction was issued for the residue (exhibit) burned for energy recovery.

7. Under Environmental Waste Services Liability Title 42 – Chapter 103 CERCLA, Subchapter I – Hazardous Substance Releases, Liability Section 9607 Statute (a)(4) states:

"Any person who accepts or accepted any hazardous substances for transport to disposal or treatment facilities, incineration vessels or sites selected by such person, from which there is a release, or a threatened release which causes the incurrence of response costs, of a hazardous substance, shall be liable for —

(A) All costs of removal of remedial action incurred by the United States Government, a State or an Indian Tribe not inconsistent with the National Contingency Plan," establishes the liability responsibility to the broker EWS.

There shall be no liability under subsection (a) of this section for a person otherwise liable who can establish by a preponderance of the evidence that the release or threat of release of a hazardous substance and the damages resulting therefrom were caused solely by (3) an act of omission of a third party other than the employee or agent of the defendant, or than one whose act or omission occurs in connection or indirectly with the defendant.

- B. Under Section 9627 – Recycling Transactions (a) Liability Clarification further state:

"(1) as provided in subsections (b) (c) (d) and (e) of this section, a person who arranges for recycling of recyclable material shall not be liable under Section 9607 (a)(3) and 9607 (a)(4) of this Title with respect to such material. (c)(1)(2)(3)(4)"

Lyon's contract with EWS was only to purchase recycled solvent in commerce.

U.S. Environmental Protection Agency
MPE Project M023401
February 21, 2005
Page 4

There is some documentary information suggesting that the United States and the State of Illinois may have contributed amounts of waste materials at the site. Under CERCLA, where the United States is both plaintiff and PRP, may cash out its liability at the site and agrees to pay its percentage of costs.

History at the Site

Over a protracted period of time (early 1900s to 1998), the site (Clayton/RRG) was utilized by a multiplicity of SIC groups in a heavily industrialized area, all of which involved those compounds of concern (COCs), which have impacted and contributed to the contamination and release that currently exists at the site. Additionally, there are Superfund sites on the perimeter and directly adjacent to the RRG site on the EPA national Priority Cleanup Register under CERCLA program. The entire region is environmentally impaired and is the home of numerous closed solid waste disposal sites, pits, sludge lagoon, and industrial dumping. During the 1960s, historical data indicates soil and groundwater contamination to the Mississippi River from Monsanto Chemical and Krumrich Dump #1.

Other entities associated with the soil contamination are Falling Rock Road, Dead Creek, Sauget-Sauget Dump, Sauget POTW inactive sludge lagoons, former Still Bottoms pit/disposal area, A-1 Waste Oil Storage, Bliss UST Trade Waste Incinerator (TWI), and Underground Pipeline.

Furthermore, GM&O Railroad utilized the site as a maintenance yard, in addition to the I.C. Railroad. Previous owners of the site include Environmental Operations, Inc., Specialty Waste Services, Inc., Emerald Environmental, Village of Sauget, and Northeast Chemical Inc.

As provided in the Hazardous Substance Pollution Contingency Plan (NCR) 40 CFR - Section 300.415, it is incumbent upon the lead agency to conduct an engineering/evaluation/cost analysis (EE/CA) of alternatives which take into full consideration of the total regional remediation area which there exists numerous NPL Superfund sites which all directly and/or indirectly have impacted the soil and groundwater over a 105 year period and should be an integral part of the overall remediation strategy.

Finally, the site is a true environmental justice concern—the typical site for which CERCLA (Superfund) was promulgated, ad to prioritize the site for cleanup using its own environmental restoration appropriations and/or the judgment fund money in accordance with U.S. Department of Justice Directive No. 00-33.

U.S. Environmental Protection Agency
MPE Project M023401
February 21, 2005
Page 5


In closing, Lyon did not arrange for the transport and treatment. Lyon did not pay for these services. Lyon did agree to purchase from EWS the reclaim solvent product as part of its Resource Conservation and Recovery Program. An MSDS was issued with each purchase under a commercial bill of lading. Lyon respectfully requests your consideration and approval to delist Lyon as a PRP and/or a de minimus classification.

Please feel free to contact me at 623-975-9565 should you have any questions.

Thank you. I look forward to your reply.

Very truly yours,

MOSTARDI PLATT ENVIRONMENTAL



Philip J. Molé
Vice President

Attachments: Exhibits

cc: William E. Muno, Director Superfund USEPA
R. P. Washington, Lyon
D. Harrison, Lyon
J. Gosselin, Lyon
P. Kinnally



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

File Copy
E.C.
5/2/04

MAY 02 2005

By Certified Mail
Return Receipt Requested

REPLY TO THE ATTENTION OF

Mr. Philip J. Molé
Vice President
Mostardi Platt Environmental
1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139

C-14J

Re: Response to formal communications of January 17 and February 21, 2005-
RRG/Clayton Chemical Company Superfund Site (Site) - Soil Removal, Sauget
(St. Clair County) IL

Dear Mr. Molé:

Thank you very much for your letters of January 17 and February 21, 2005, regarding the above referenced Site and the position of your client, Lyon Metal Products, LLC (Lyon).

The United States Environmental Protection Agency (EPA) has reviewed the issues raised in your above referenced identical letters to Mr. Thomas Geischecker of the Superfund Division. A review of the facts and legal matters that you raise, indicates no appreciable change in the position of your client, Lyon, since the hazardous liquids Superfund removal performed by the PRP hazardous liquids group between 2002 and 2004. EPA still maintains that Lyon is a PRP, properly identified in the large hazardous waste contributors group from the November 2004 General Notice letter, based upon the known facts at hand and our interpretation of liability as described in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC Sections 9601 et seq. EPA does not plan to delist Lyon as a PRP at the Site.

In regard to the points referenced in your letter in its introduction, concerning the participation (or lack thereof) of Lyon in the 2002-2004 hazardous liquids removal at the Site, EPA would note that whatever ultimate arrangement has been arrived at between the participating and cooperating PRP hazardous liquids removal group and Lyon, is not of concern to EPA. Moreover, any legal position taken or maintained by Lyon with respect to its settlement of the hazardous liquids clean up costs with the PRP hazardous liquids removal group in no way effects EPA's determination that Lyon is a liable and viable PRP for the current hazardous soil removal.

In regard to your points raised in paragraphs 1 and 2 of your letter, EPA would note that initially (in the 3rd paragraph of the letter's introduction) you assert that Lyon is not a liable PRP at the Site; yet, in paragraphs 1 and 2, you assert that Lyon is a liable but de minimis hazardous waste contributor to the Site. This is an inconsistency that leads to some doubt as to the validity of the overall assertions made by Lyon. Furthermore, the EPA technical expert on this case does not

agree with the rationale of your paragraph 1 analysis and characterization of the hazardous waste material and quantity reportedly sent by Lyon to the Site. *[Kevin: Please review the copy of the P. Mole (Lyon Metals) letter that I sent to you and let me know if my statement is correct here. Thanks.]* Nor does EPA agree with your assertion in paragraph 2. However, I would note that even if it were determined to be correct, it would leave Lyon as a contributor of approximately 159,000 gallons of hazardous waste material and still a properly designated large PRP contributor at the Site. (As you yourself noted, the cut-off level for the November 2004 General Notice letter was 75,000 gallons).

In regard to your points raised in paragraphs 3 through 6, EPA would note that other PRPs drums were also absent from Site inspections and assessments. It is not the presence or absence of drums that matter in this case, but rather what was done with the hazardous material contents of those drums between approximately 1981 and 1998, at the Site. EPA has contended since the beginning of its enforcement activities at the Site that the mingling of wastes and the poor maintenance of the Site containment and transfer equipment has resulted in an indivisible contamination of the soil at the Site by the hazardous waste materials sent to the Site for treatment or recycling by a number of parties, including Lyon.

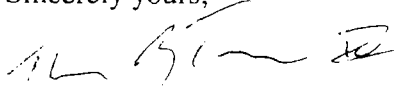
In regard to your points raised in paragraph 7, EPA would note that RCRA is a 'cradle to grave' statute and that a party that chooses to commercially work with the types of hazardous waste materials regulated by RCRA, assumes the risk of a failure of the transportation, storage or disposal of these materials and of facing CERCLA liability. This has happened to Lyon.

In regard to your points raised in paragraph 8, EPA disagrees with your assumption of the applicability of the provisions of 42 USC Section 9627 to the hazardous waste liquids sent to the Site. The recycling provisions of CERCLA 127, are clearly designated as (where no exclusion applies) "recyclable material" meaning: scrap paper, scrap plastic, scrap glass, scrap textiles, scrap rubber (other than whole tires), scrap metal, or spent lead-acid, spent nickel-cadmium, and other spent batteries, as well as minor amounts of material incident to or adhering to the scrap material as a result of its normal and customary use prior to becoming scrap..." See, 42 USC Section 9627(b). Lyon sent hazardous waste liquid material that does not qualify for the defined protection of the CERCLA recycling provisions.

Finally, EPA would note that in your discussion of the history of Lyon at the Site, you reference the applicability of an engineering evaluation/cost analysis (EECA) and Environmental Justice concerns. EPA is cognizant of EECA requirements, and Environmental Justice concerns. EPA would note that in time-critical and emergency removal situations, the use of an EECA is not mandatory and the timely performance of a removal action with cooperating PRPs is proper and supportive of federal Environmental Justice concerns. See, 40 CFR 300.415(b)(1)-(3).

Please feel free to contact me with any comments or questions at Turner.Thomas@epa.gov, or by telephone at 312/886-6613.

Sincerely yours,



Tom Turner

Staff Attorney - U.S. EPA, ORC, Region 5

cc: L. Nachowicz, Chief
Superfund Removal Branch

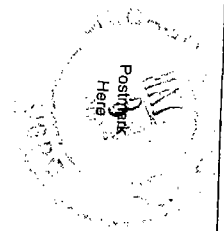
B. Ryczek, Enf. Spec.

K. Turner, OSC

7002 2410 0002 2845 3231

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com®

Postage	\$ 6.00
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65



Sent To: *Philip M. Old*
 Street Apt. No.: *1520 Kensington Rd.*
 or PO Box No.: *2139*
 City, State, ZIP+4: *CHICAGO, IL 60623-2139*
 PS Form 3800, June 2002 See Reverse for Instructions

UNITED STATES POSTAL SERVICE



First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

THOMAS TURNER
U.S. EPA / C-145
77 W. JACKSON BLVD
CHICAGO, IL 60604
 U.S. ENVIRONMENTAL PROTECTION AGENCY
 MAY 09 2005
 OFFICE OF REGIONAL COUNSEL



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Philip Mole
Mostardi Platt Environmental
1520 Kensington Road-Suite 204
Oakbrook, IL 60523-2139

COMPLETE THIS SECTION ON DELIVERY

A. Signature X <i>[Signature]</i>		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name)	C. Date of Delivery <i>5/15</i>	
Is your address different from item 1? enter delivery address below:		<input type="checkbox"/> Yes <input type="checkbox"/> No

3. Service Type	
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail	<input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee)	
<input type="checkbox"/> Yes	

2. Article Number
(Transfer from service label) **70022410000228453231**

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail is not available for First-Class Mail or Priority Mail.
- Certified Mail is not available for Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested" or receive a fee waiver for a duplicate return receipt, a USPS deposit or a Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. To restrict delivery, the mailpiece with the endorsement "Restricted Delivery" must be presented at the post office for postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.
Internal access to delivery information is not available on mail addressed to APOs and FPOs.

OFFICE OF REGIONAL

(Reverse)
2651-M-20-595201
PS Form 3800, June 1998



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

E.6
11-22-04

November 22, 2004

REPLY TO THE ATTENTION OF

VIA FEDERAL EXPRESS

RRG Clayton Chemical Site (soil
removal)

Patrick M. Kinnally
Kinnally, Krentz, Loran, Hodge & Herman, P.C.
for Lyon Metal Products LLC
2114 Dearpath Road
P.O. Box 5030
Aurora, IL 60507-5030

Re: Clayton Chemical Site General Notice of Potential Liability
letter.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site, and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

The U.S. EPA is currently planning to conduct the following actions at the above referenced Site:

1. Develop and implement a site health and safety plan;
2. Provide security for the site;

3. Sample, characterize, and consolidate for removal and disposal all contaminated soils found on-site, all solids found in tanks (a.k.a. tank bottoms) and any other hazardous waste solid material found on-site;
4. Transport and dispose of all characterized hazardous substances, pollutants, wastes, or contaminants at a RCRA approved disposal facility in accordance with the U.S. EPA Off-Site Rule, 40 CFR 300.440.
5. Backfill the excavated site areas with clean material and topsoil. Restore and vegetate excavated areas to prevent soil erosion.

U.S. EPA has received information that you may be a potentially responsible party (PRP) at this Site. The information used by U.S. EPA in part to make this determination was provided by the group of PRPS that conducted the initial liquids removal action at this Site. The report used by U. S. EPA titled "The RRG/Clayton Liquids Removal, Investigation Report" included a volumetric ranking of PRPs that may have sent liquids, solids and or other material to be processed at the Site. Based on U.S. EPA's review and analysis of the volumetric ranking in that report; the Agency is notifying all PRPs that sent or contributed 75,000 gallons or more to the Site that they are PRPs. This group consists of only 73 of the approximate 2,800 PRPs that sent material to this Site to be processed. However, U.S. EPA calculations indicate that the initial group of 73 PRPs contributed over 72% of the wastes processed at the Site.

The Agency's decision to initially only Notice the 73 largest PRPs at this Site is based on a number of factors. First, U. S. EPA wants to begin a removal action at this Site as soon as possible and having a limited number of PRPs in the group will make this possible. Second, EPA believes that having the small initial group of 73 PRPs will make it easier for them to come to agreement and decisions on the many actions that need to be made during the course of the Site clean up. Finally, U. S. EPA plans to notice the remaining PRPs identified in the aforementioned report but would like input from this initial PRP group on how best to notify them of their responsibility for this Site.

U.S. EPA is inviting the initial group of 73 PRPs to meet with Agency officials on either Tuesday, December 7, 2004, at 1:00 p.m. or on Wednesday December 8, 2004 at 10:00 a.m. Both meetings will be held at the East St. Louis Public Library 5300 State Street, East St. Louis, Illinois 62203. It is only necessary to attend one of the meetings.

By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a PRP, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days after the December 8, 2004 PRP meeting, regarding your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you or your organization does not wish to negotiate a resolution of its potential responsibility in connection with the Site and that you or your organization has declined any involvement in performing the response activities.


Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions. Your response should be sent to:

Tom Turner
Associate Regional Counsel
U.S. EPA - Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, Illinois 60604

If you need further information regarding this letter, you may contact Tom Turner of the Office of Regional Counsel at, (312) 886-6613.

Due to the nature of the problem at this site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frame specified herein. We hope you will give this matter your immediate attention.

Sincerely,


Thomas Geisheider, Acting Chief
Emergency Response Branch

Attachment: A-General Notice PRP list.

APPENDIX A
List of Potential Responsible Parties Receiving a General Notice Letter for the
RRG Clayton Chemical Site (Soil Removal)

NASCOTE INDUSTRIES, INC.
Margaret A. Coughlin Esq.
Dickinson Wright, PLLC
38525 Woodward Ave., Suite 2000
Bloomfield Hills, MI 48304-2970

FORD MOTOR COMPANY
Sir Nicholas V. Scheele, President
Ford Motor Company
One American Road
Dearborn, MI 48126

SIGMA-ALDRICH CORPORATION
Mr. Jai Nagarkatti, President
Sigma-Aldrich Corporation
3050 Spruce Street
St. Louis, MO 63103

MALLINCKRODT INC.
Mr. Peter S. Strassner
Thompson Coburn LLP
One US Bank Plaza
St. Louis, MO 63101-1693

BLISS WASTE OIL COMPANY
Mr. Jerry Bliss, Owner
Bliss Waste Oil Company
149 Strecker Road
Ballwin, MO 63011

A-1 OIL CORPORATION
Mr. Jerry Bliss, Registered Agent
A-1 Oil Corporation
149 Strecker Road
Ballwin, MO 63011

DAIMLERCHRYSLER CORPORATION
Mary Ericson Waters
Daimler-Chrysler Corporation
1000 Chrysler Drive
CIMS 482-13-62
Auburn Hills, MI 48326-2766

LEAR CORPORATION
Mr. Robert E. Rossiter, President
Lear Corporation
21557 Telegraph Road
Southfield, MI 48034

U.S. PAINT CORPORATION
Mr. John Duchardt, President
U.S. Paint Corporation
831 South 21st Street
St. Louis, MO 63103

STERLING LACQUER MANUFACTURING COMPANY
Mr. Leo V. Mitchell, President
Sterling Lacquer Manufacturing Company
3150 Brannon Ave.
St. Louis, MO 63139

SUPERIOR EQUIPMENT COMPANY, INCORPORATED
Bruce A. Morrison Esq.
Green, Hennings & Henry, LLP
705 Olive Street, Suite 614
St. Louis, MO 63101-2208

THE SWAN CORPORATION
Greensfelder, Hemker & Gale, P.C.
2000 Equitable Building
10 South Broadway
St. Louis, MO 63102-1774

PLASTIC PRODUCTS CO., INC.
Ms. Marlene Messin, President
Plastic Products Co., Inc.
30355 Akerson Street
Lindstrom, MN 55045

HUSSMAN CORPORATION
Mr. Randy Smith, President
Hussman Corporation
12999 St. Charles Rock Road
Bridgeton, MO 63044

UOP LLC
Mr. Carlos Guimaraes, President
UOP LLC
25 East Algonquin Road
Building A
Des Plaines, IL 60016

NATIONAL COATINGS INC.
S. David Simpson
Hattery, Simpson & West
Suite 402 Hill Arcade
Galesburg, IL 61402

CERRO FLOW PRODUCTS, INC.
Richard F. Ricci Esq.
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, NJ 07068-1791

NORTH EAST RECYCLING TRANSPORTATION, INC.
James P. Oliver Esq., Registered Agent
Squire, Sanders & Dempsey L.L.P.
for North East Recycling Transportation, Inc.
4900 Key Tower, 127 Public Square
Cleveland, OH 44114

OLIN CORPORATION
Mr. Joseph D. Rupp, President
Olin Corporation
501 Merritt 7
Norwalk, CT 06856

MONSANTO COMPANY
Mr. Hugh Grant, President
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

NORFOLK SOUTHERN RAILWAY COMPANY
Mr. Charles W. Moorman, President
Norfolk Southern Railway Company
3 Commercial Place
Norfolk, VA 23510

SEQUA CORPORATION
Mr. Norman E. Alexander, Chief Executive Officer
Sequa Corporation
200 Park Avenue
New York, NY 10166

BOBEN MANUFACTURING COMPANY
Mr. Robert H. Slosberg, Registered Agent
Boben Manufacturing Company
11 Nantucket Ln.
St. Louis, MO 63132

AAD DISTRIBUTION & DRY CLEANING SERVICES,
INC
Mr. Hormoz Pourat c/o Ms. Paula Silverbush Pourat
for AAD Distribution and Dry Cleaning Services, Inc.
5107 Enfield Avenue
Encino, CA 91316

TEVA PHARMACEUTICALS USA, INC.
Gail S. Port Esq.
Proskauer Rose, LLP
1585 Broadway
New York, NY 10036

DIOSYNTH, INC.
Mr. C. Nederveen, President
Diosynth, Inc.
2136 South Wolf Road
Des Plaines, IL 60018

COLEMAN CHEMICAL, INC.
Mr. Albert R. Puntureri, President
Coleman Chemical, Inc.
75 Sanger St.
Peoria, IL 61602

TNEMEC COMPANY, INC.
Mr. Peter F. Cortelyou, President
Tnemec Company, Inc.
6800 Corporate Dr.
Kansas City, MO 64120

MCINTYRE GROUP, LTD.
Eric E. Boyd Esq.
Seyfarth Shaw LLP
55 E. Monroe St., Suite 4200
Chicago, IL 60603

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
Mr. Gary L. Rainwater, President
Central Illinois Public Service Company
One Ameren Plaza
1901 Chouteau Avenue
St. Louis, MO 66149

EXXONMOBIL OIL CORPORATION
Mr. Rex W. Tillerson, President
ExxonMobil Oil Corporation
5959 Las Colinas Blvd.
Irving, TX 75039-2298

LYON METAL PRODUCTS, L.L.C.
Patrick M. Kinnally Esq.
Kinnally, Krentz, Loran, Hodge & Herman, P.C.
for Lyon Metal Products LLC
Aurora, IL 60507-5030

CHICAGO DRUM, INC.
Mr. Buddy Ross, President
Chicago Drum, Inc.
6829 Flintlock Road
Houston, TX 77040

RILEY BROTHERS COMPANY
Mr. James S. Jennison, President
Jennison Industries, Inc.
on behalf of Riley Brothers Company
106 Washington Avenue
Burlington, IA 56201

UNIVERSAL PACKAGING CORPORATION
Ms. Gloria Cobb, President
Universal Packaging Corporation
4761 Moline Street
Denver, CO 80239

TITAN WHEEL CORPORATION OF ILLINOIS
Mr. Ronald B. Schildt, President
Titan Wheel Corporation of Illinois
2701 Spruce Street
Quincy, IL 62301

WALKER PADUCAH CORP.
Mr. Craig E. Philips, President
Walker Paducah Corp.
4400 Harding Road
Nashville, TN 37205

SILGAN CONTAINERS CORPORATION
Mr. James D. Beam, President
Silgan Containers Corporation
21800 Oxnard St., Suite 600
Woodland Hills, CA 91367

SAFETY-KLEEN SYSTEMS, INC.
Frederick J. Florjancic Jr., President & CEO
Safety-Kleen Systems, Inc.
5400 Legacy Dr.
Cluster II, Bldg. 3
Plano, TX 75024

INX INTERNATIONAL INK COMPANY
Mr. Richard Clendenning, President
INX International Ink Co.
651 Bonnie Lane
Elk Grove Village, IL 60007

KEYSTONE CONSOLIDATED INDUSTRIES, INC.
Mr. David Cheek, President
Keystone Consolidated Industries, Inc.
dba Keystone Steel & Wire Company
7000 SW Adams St.
Peoria, IL 61641

PENN ALUMINUM INTERNATIONAL, INC.
John Nichols
Penn Aluminum International, Inc.
1117 North 2nd St.
Murphysboro, IL 62966

AFTON CHEMICAL CORPORATION
Mr. C. S. Warren Huang, President
Afton Chemical Corporation
500 Spring St.
Richmond, VA 23219

KOCH INDUSTRIES, INC.
Mr. Joseph Moeller, President
Koch Industries, Inc.
4111 E. 37th St. North
Wichita, KS 67720

BEMIS COMPANY, INC.
Mr. Jeffrey Curler, President
Bemis Company, Inc.
222 S. 9th St.
Suite 2300
Minneapolis, MN 55402

VALENTEC WELLS, LLC
President
Valentec Wells, LLC
Lake City Army Ammunition Depot
Building 2
Independence, MO 64051

STEELCOTE MANUFACTURING COMPANY
Mr. John Milner, President
Steelcote Manufacturing Company
One Steelcote Square
St. Louis, MO 63103

AMERICAN RECREATION PRODUCTS, INC.
Mr. George J. Grabner Jr., President
American Recreation Products, Inc.
1224 Fern Ridge Parkway
St. Louis, MO 63141

BAKER PETROLITE CORPORATION
Ms. Halina E. Caravello
Baker Petrolite Corporation
12645 West Airport Blvd.
Sugar Land, TX 77478

CHEMISPHERE CORPORATION
Mr. Robert F. Schwent, President
Chemisphere Corporation
2101 Clifton Ave.
St. Louis, MO 63139

IMPERIAL HOME DECOR GROUP, INC.
Mr. Douglas R. Kelly, President
Imperial Home Decor Group, Inc.
23645 Mercatile Rd.
Cleveland, OH 44122

MARCHEM CORPORATION
Mr. Sandon L. Wool, President
Marchem Corporation
2500 Adie Rd.
Maryland Heights, MO 63043

DON V. DAVIS COMPANY
Ms. Ophelia Davis, Owner
Don V. Davis Company
5955 Goodfellow Blvd.
St. Louis, MO 63147

CURWOOD, INC.
Mr. Tom Sall, President
Curwood, Inc.
2200 Badger Ave.
Oshkosh, WI 54903

THE KANSAS CITY SOUTHERN RAILWAY
COMPANY
Mr. Michael Haverty, President
The Kansas City Southern Railway Company
427 W. 12th St.
Kansas City, MO 64121

ARRIS INTERNATIONAL, INC.
Mr. Randy Brogdon Esq.,
Troutman Sanders LLP
for Arris International, Inc.
600 Peachtree St., Ste. 5200
Atlanta, GA 30308-2216

SAFETY-KLEEN (TS), INC.
Mr. David M. Sprinkle, President
Safety-Kleen (ts), Inc.
5400 Legacy Dr.
Cluster II, Bldg. 3
Plano, TX 75024

MITSUBISHI MOTORS NORTH AMERICA, INC.
Mr. Pierre M. Gagnon, President
Mitsubishi Motors North America, Inc.
6400 Katella Ave.
Cypress, CA 90630

THE DOW CHEMICAL COMPANY
Mr. Andrew N. Liveris, President
The Dow Chemical Company
2030 Dow Center
Midland, MI 48674

SUPERIOR OIL CO., INC.
Mr. Ray Roembke Jr., President
Superior Oil Co., Inc.
400 W. Regent St.
Indianapolis, IN 46225

LYON WORKSPACE PRODUCTS, LLC
Mr. R. P. Washington, Chairman
Lyon Workspace Products, LLC
420 North Main Street
Montgomery, IL 60538

NORDENIA U.S.A., INC.
Julie O'Keefe Esq.,
Armstrong Teasdale, LLP
for Nordenia U.S.A., Inc.
One Metropolitan Square, Suite 2600
St. Louis, MO 63102-2740

METAL CONTAINER CORPORATION
Mr. Joseph P. Sellinger, President
Metal Container Corporation
One Busch Place
St. Louis, MO 63118

ALLIED HEALTHCARE PRODUCTS, INC.
Mr. Earl R. Refsland, President
Allied Healthcare Products, Inc.
1720 Sublette Ave
St. Louis, MO 63110

CROWN BEVERAGE PACKAGING, INC.
Mr. Robert J. Truitt, President
Crown Beverage Packaging, Inc.
One Crown Way
Philadelphia, PA 19154

CONOPCO, INC.
Mr. Charles B. Strauss, President
Conopco, Inc.
700 Sylvan Ave.
Englewood Cliffs, NJ 07632

DJR HOLDINGS, INC.
Mr. Rodney D. Jarboe, President
DJR Holdings, Inc.
1019 Skinker Parkway
Hazelwood, MO 63042

LINCOLN INDUSTRIAL CORPORATION
Mr. Mark T. Schroepfer, President
Lincoln Industrial Corporation
One Lincoln Way
St. Louis, MO 63120



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 10 2002

REPLY TO THE ATTENTION OF
RRG/Clayton Chemical Co. Site

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Lyon Metal Products, LLC
420 N. Main St.
Montgomery, IL 60538

Re: RRG/Clayton Chemical Co. Superfund Site, 1 Mobile Avenue,
Sauget, IL (St. Clair County) - DRAFT CERCLA AOC for review and
comment

Dear Sir or Madam:

Enclosed is a proposed Administrative Order by Consent ("AOC"), pursuant to Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §9606, by which your client would agree to undertake phased removal actions of hazardous liquids and then soils determined by the United States Environmental Protection Agency ("U.S. EPA") to be necessary at the RRG/Clayton Chemical Company Site, at 1 Mobile Avenue, in Sauget, St. Clair County, Illinois. In addition, by signing the AOC your client would agree to reimburse the United States for its costs of overseeing the removal actions performed under this Order and the costs which the United States has already incurred at said Site in the approximate amount of \$105,000. While the enclosed has not been approved by the official having the legal authority to bind the U.S. EPA, if your client executes the document, the undersigned and the On-Scene Coordinator (OSC) for this Site will recommend that the agency enter the AOC in its present form.